REMARKS

This Application has been carefully reviewed in light of the Office Action mailed February 10, 2004. Claims 1-20 were pending in the Application. The Examiner rejects Claims 1-20. Applicants amend Claims 1, 4, 7, and 14, and add new Claims 21-24, which are fully supported by the specification as originally filed. Applicants respectfully request reconsideration and favorable action in this case.

Interview Summary

Applicants' attorney, Mr. Kurt M. Pankratz (Reg. No. 46,977), conducted a telephonic interview with Examiner Jonathan D. Schlaifer and Primary Examiner Stephen Hong on March 15, 2004. Applicants thank the Examiners for the courtesy and opportunity to conduct the telephonic interview. Applicants submit this summary of the telephonic interview to record Applicants' understanding of the substance of the interview and to comply with M.P.E.P. §713.04.

During the interview, the Examiners and the attorney for Applicants discussed rejections of the claims and potential amendments.

Claim Rejections - 35 U.S.C. §101

The Examiner rejects Claims 1-3 and 7-13 under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants respectfully submit that Applicants' amendments to independent Claims 1 and 7, from which Claims 2, 3, and 8-13 depend, obviate this rejection. Thus, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of Claims 1-3 and 7-13.

Claim Rejections - 35 U.S.C. §102

The Examiner rejects Claims 1-2, 4-5, 7, and 14 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,173,853, which issued to Kelly et al. ("*Kelly*"). To anticipate a claim, a single prior art reference must describe, either expressly or inherently, each and every element of the claim. M.P.E.P. §2131. Furthermore, "[t]he elements must be arranged as required by the claim." *Id.* (quoting *In re Bond*, 910 F.2d 831 (Fed. Cir. 1990)).

Claims 1-2 and 4-5

Applicants' independent Claim 1, as amended, recites:

> A method, comprising the steps of:
>
> providing a set of predetermined function definitions which are different; and
>
> preparing a project definition, said project definition including:
>
> a plurality of function portions which each correspond to one of said function definitions in said set, and which each define at least one input port of said function portion and at least one output port of said function portion that are functionally related according to the corresponding function definition;
>
> a further portion which includes a source portion identifying a data source and defining an output port of said source portion through which data from the data source can be produced, and which includes a destination portion identifying a data destination and defining an input port of said destination portion through which data can be supplied to the data destination; and
>
> binding information which includes binding portions that each associate a respective one of said input ports with one of said output ports, at least one of said binding portions being a conditional binding which is responsive to a specified condition for associating a respective one of said input ports with one of a plurality of different said output ports that form a set;
>
> wherein preparing said project definition comprises:
>
> displaying a project window that includes a graphical representation of said project definition; and
>
> allowing a user to modify said project definition by interacting with said graphical representation using a pointing tool.

Applicants respectfully submit that *Kelly* fails to disclose every element of this Claim. In general, *Kelly* discloses conversion of documents from a first document architecture to a second document architecture. More particularly, *Kelly* discloses conversion of documents from Compound Document Architecture to Open Document Architecture.

Among other aspects of Claim 1, *Kelly* fails to disclose "a conditional binding which is responsive to a specified condition for associating a respective one of said input ports with one of a plurality of different said output ports that form a set." As teaching this element, the Examiner cites the abstract of *Kelly* and states that "different types of data are handled by

appropriate content handlers." However, handling different types of data by different content handlers in no way shows "a conditional binding which is responsive to a specified condition for associating a respective one of said input ports with one of a plurality of different said output ports that form a set."

Furthermore, *Kelly* fails to disclose "displaying a project window that includes a graphical representation of said project definition" and "allowing a user to modify said project definition by interacting with said graphical representation using a pointing tool."

Moreover, the Examiner's citation of various sections of *Kelly* fails to show the claim elements arranged in the manner required by Claim 1. For example, *Kelly* fails to disclose a project definition including a plurality of function portions. As teaching the project definition, the Examiner cites to a structure converter. As teaching the plurality of function portions, the Examiner cites to Document Application Profiles (DAPs). *Office Action*, page 3. However, *Kelly* discloses that the "DAP contains a structure converter." *Kelly*, Abstract. Thus, the Office Action merely points out various aspects of *Kelly* that are not arranged as required by Claim 1.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 1. For analogous reasons, Applicants request reconsideration and withdrawal of the rejection of Claim 4. Claims 2 and 5 depend from Claims 1 and 4 respectively and therefore incorporate the elements shown above to be allowable. Thus, for at least the same reasons discussed above, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of Claims 1-2 and 4-5.

Claims 7 and 14

Applicants' independent Claim 7, as amended, recites:

> A method, comprising the steps of:
> providing a set of predetermined function definitions which are different; and
> preparing a project definition, said project definition including:
> a plurality of function portions which each correspond to one of said function definitions in said set, and which each define at least one input port of said function portion and at least one output port of said function portion that are functionally related according to the corresponding function definition, at least one of said function definitions being operative to automatically convert to a predetermined data type

any data which is received at the input port thereof as a data type other than said predetermined data type;

a further portion which includes a source portion identifying a data source and defining an output port of said source portion through which data from the data source can be produced, and which includes a destination portion identifying a data destination and defining an input port of said destination portion through which data can be supplied to the data destination; and

binding information which includes binding portions that each associate a respective one of said input ports with one of said output ports;

wherein preparing said project definition comprises:

displaying a project window that includes a graphical representation of said project definition; and

allowing a user to modify said project definition by interacting with said graphical representation using a pointing tool.

Applicants respectfully submit that *Kelly* fails to disclose every element of this Claim.

Among other aspects of Claim 7, *Kelly* fails to disclose "at least one of said function definitions being operative to automatically convert to a predetermined data type any data which is received at the input port thereof as a data type other than said predetermined data type." As teaching this element, the Examiner cites *Kelly* and states that "all files entering the converter emerge as ODA documents and all subparts of the document are handled by document handlers." However, *Kelly* discloses converting documents from CDA architecture to ODA architecture. Converting files in this manner fails to show "at least one of said function definitions being operative to automatically convert to a predetermined data type *any data* which is received at the input port thereof as a data type other than said predetermined data type."

Furthermore, as mentioned above with respect to Claim 1, *Kelly* fails to disclose "displaying a project window that includes a graphical representation of a project definition" and "allowing a user to modify said project definition by interacting with said graphical representation using a pointing tool."

Moreover, the Examiner's citation of various sections of *Kelly* fails to show the claim elements arranged in the manner required by Claim 7.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 7. For analogous reasons, Applicants request reconsideration and withdrawal of the rejection of Claim 14.

Claim Rejections - 35 U.S.C. §103

The Examiner rejects Claims 3, 6, 8-13, and 15-20 under 35 U.S.C. §103(a). To establish obviousness of a claimed invention under §103, all claim limitations must be taught or suggested by the prior art. M.P.E.P. §2143.03.

Claims 3, 6, 10-13, and 17-20

The Examiner rejects Claims 3, 6, 10-13, and 17-20 under 35 U.S.C. §103(a) as being unpatentable over *Kelly* in view of "Microsoft Word: User's Guide", 1993-1994, Version 6.0 p. 590-591 ("*Microsoft Corporation*"). Claims 3, 6, 10-13, and 17-20 each depend from an independent claim shown above to be allowable over *Kelly*. The introduction of *Microsoft Corporation* fails to provide the elements of Applicants' independent claims not shown by *Kelly*. Thus, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of Claims 3, 6, 10-13, and 17-20.

Claims 8-9 and 15-16

The Examiner rejects Claims 8-9 and 15-16 under 35 U.S.C. §103(a) as being unpatentable over *Kelly*. Claims 8-9 and 15-16 each depend from an independent claim shown above to be allowable over *Kelly*. Thus, for at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of Claims 8-9 and 15-16.

New Claims

Applicants have added new Claims 21-24, which are fully supported by the specification as originally filed. Applicants respectfully submit that these Claims add additional elements patentably distinct over *Kelly* and *Microsoft Corporation*. Therefore, Applicants respectfully request consideration and allowance of Claims 21-24.

Conclusions

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants enclose a check for $72.00 to cover the cost of filing four additional dependent claims. The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicants

Kurt M. Pankratz
Reg. No. 46,977

Date: May 10, 2004

CORRESPONDENCE ADDRESS:
2001 Ross Ave., Suite 600
Dallas, TX 75201-2980
Tel. 214.953.6477

CUSTOMER NUMBER:

05073

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DAL01:783378.1